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*Attorneys for Defendant, Bellagio, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANDI KRAJA, an individual;

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada Corporation;  
VINCENT ROTOLO, an individual; ROE  
Business Organizations I-X; and DOE  
INDIVIDUALS I-X, Inclusive,

Defendants.

Case No. 2:15-cv-01983-APG-NJK

**DEFENDANT BELLAGIO, LLC'S  
PROTECTIVE NOTICE OF APPEAL**

Notice is hereby given that Defendant Bellagio, LLC, ("Defendant" or "Bellagio") by and through its attorneys, Pisanelli Bice, PLLC, hereby appeals to the United States Court of Appeals for the Ninth Circuit from the following: Judgment in a Civil Case (ECF No. 203), and all other decisions and orders made appealable therefrom, including, without limitation:

1. Defendants' Amended Proposed Jury Instructions (ECF No. 183)
2. Jury Instructions (ECF No. 198)
3. Jury Verdict (ECF No. 202)
4. Bill of Costs (ECF No. 207)

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1 Bellagio acknowledges that this Notice of Appeal may be premature in light of Bellagio's  
2 pending post-trial Motion (ECF No. 214) before the District Court. However, Bellagio files this  
3 Protective Notice of Appeal out of an abundance of caution to preserve all rights.

4 DATED this 3rd day of May, 2019.

5 PISANELLI BICE PLLC

6  
7 By: /s/ Todd L. Bice  
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Las Vegas, Nevada 89101

10 *Attorneys for Defendant, Bellagio LLC*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC and that, on this 3rd day of May, 2019, I caused to be served via the Court's CM/ECF service system a true and correct copy of the above and foregoing **DEFENDANT BELLAGIO, LLC'S PROTECTIVE NOTICE OF APPEAL** to the following:

James P. Kemp, Esq.  
Victoria L. Neal, Esq.  
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*Attorneys for Plaintiff*

/s/ Christi Colucci  
An employee of PISANELLI BICE PLLC

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